

REMARKS

Claims 1-27 are presented for examination. In the Action mailed December 12, 2007, claims 1-27 were rejected under 35 U.S.C. 103(a) as being unpatentable over Roztocil et al. (U.S. Patent No. 6,995,860) (hereinafter Roztocil) in view of Matthews et al. (U.S. Publication No. 20040049547) (hereinafter Matthews).

Claims 1, 10, 14, and 19-21 have been amended. No new claims have been added and no claims have been cancelled in this Amendment.

Entry of Amendment After Final Rejection

Review and consideration of the present arguments is requested and considered proper under 37 C.F.R. § 1.116(b)(3) because in the Office Action mailed December 12, 2007, the Examiner cited new art. In the interest of furthering prosecution of the application, the Applicant should be afforded the opportunity to present to the Examiner arguments as to why the claims are allowable over the newly cited art. Furthermore, the amendments made to the claims encompass material that was reasonably expected to be claimed, and thus should not require a new search. (See MPEP 904.02, "The search should cover the claimed subject matter and should also cover the disclosed features which might *reasonably be expected to be claimed.*")

35 U.S.C. 103(a) Rejections

Claims 1-27 were rejected under 35 U.S.C. 103(a) as being unpatentable over Roztocil in view of Matthews. Roztocil discloses a production printing workflow management system 100 that includes production printing workflow management software 300, shown in Roztocil's Figure 3.

Applicant's claim 1 recites:

A remote assistance system comprising
one or more user systems for allowing a customer of a remote printing services site to customize graphical content of a design of a product to be printed, each user system being operatively connected to a network and having a user processor running a browser program, one or more user tools executing in the browser program on the user processor and configured to allow a customer user of the user system to customize the design of a product at the user system and to

communicate over the network with the remote printing services site, and a user display displaying the product design to the customer user of the user system, one or more remote support systems, each remote support system being operatively connected to the network and having a support processor, a support display, and one or more programs running on the support processor configured to allow an operator of the support system to view a user's product design substantially as the product design is being displayed to the user on the user display,

means for establishing a communication connection between a user of a user system and an operator of a remote support system such that the user of the user system can submit product design inquiries to and receive responses from the operator of the remote support system while the product design is displayed to the user, and

means for establishing a communication connection between the user system and the remote support system such that the support system can obtain the user's product design information from the user system over the network and display the product design to the operator while the operator is communicating with the user over the first communication connection.

Roztocil discloses a production work flow system 100 (*Roztocil*, Fig. 1) of a production print shop such as a commercial high volume copy or print shop. (*Roztocil*, col. 3, lines 30-33). The production workflow 100 includes the procedural stages of job origination 102, job submission 104, job preparation 106, print production 108 and final fulfillment 110. (*Roztocil*, col. 3, lines 60-63). *Job origination 102* is receiving documents and instructions, which together are defined as a "job", *from the customer*. (*Roztocil*, col. 8, 65-67). *Job submission 104* is the receipt of the job *by the print shop* and entering of the job into the print shop's production system, which typically also generates a "ticket" comprising the instructions from the customer. (*Roztocil*, col. 4, lines 16-20). For the job submission stage 104, a number of "store front" workstations 114, which are computer systems placed at the order taking desk, at a manned clerk's station or set out for customer self service use. At the store front workstations 114, the customer jobs are entered into the print shop production system. The workstations 114 are configured to accept many different media types and electronic file formats. The workstations 114 also generate a ticket for the job containing all of the instructions for completing the production printing task. (*Roztocil*, col. 4, line 45 through col. 5, line 8).

Job preparation 106 is preparing the document for printing according to the instructions in the ticket. (*Roztocil*, col. 5, lines 13-14). This involves ensuring or active

converting of all documents in the job into an electronic form having a common file format that the print shop can use to both edit and print the documents. (Roztocil, col. 5, lines 14-24). Importantly, Roztocil discloses only the print shop *operator* performing job preparations 106 and not the customer of the job. (See col. 5, lines 20-24 and 32-42, col. 6, lines 52-57). For example, in col. 6, lines 52-57, Roztocil explains: "The job preparation workstations 116 also provide the capability of *the print shop* to *add value to the print production process by offering services to the customer*. Such services include the ability to modify documents provided by the customer to add features that *the customer could not or would not add himself*." These features include adding page numbers, adjusting page layout for tab stock, aligning the output to account for binding, removing artifacts in scanned images and masking over unwanted text or markings, etc. Roztocil further explains at col. 7, lines 7-17: "In addition, the job preparation station 116 allows *the operator* to manage and layout the document pages for final output, also known as "imposition" and "signature imposition". In addition, *the operator* can shuffle pages, reverse pages, insert blank pages, trim and shift pages, create bleeds and place multiple pages on a sheet, also known as 'n-up' to create proof sets, brochures or pamphlets, etc. Further the job preparation station 116 permits *the operator* to add annotations to the document such as Bates number, page numbers, logos and watermarks. All of these service add value to the final output."

In the *print production stage 108*, the final form of the documents for printing is sent to a print server 120 which will distribute the job to the final output device 122. (Roztocil, col. 7, lines 35-39). The *final fulfillment stage 110* is the stage where the finished output is produced on the production output device 122, such as a printer. (Roztocil, col. 8, lines 18-20).

Turning now to the specific limitations of ***claim 1***, Roztocil does not teach or suggest "one or more user systems for allowing a **customer of a remote printing services site to customize graphical content of a design of a product to be printed**, each user system being operatively connected to a network and having a user processor running a browser program, **one or more user tools executing in the browser program** on the user processor and configured to allow a customer user of the user system to customize the design of a product at the user system and to communicate over the

network with the remote printing services site, and a user display displaying the product design to the customer user of the user system". As explained in the discussion of the Roztocil reference above, in the Roztocil system, the customer of the job merely supplies the documents and job instructions to the print shop during the job origination stage 102 and/or job submission stage 104. This means that the customer may merely supply one or more documents including paper and/or electronic documents in native application formats (such as, for example, a Microsoft Office™ Product format, a QuarkXpress™ format, etc.) and instructions for printing the job (such as, for example, adding page numbers and assembling into chapters whose first page always begins on the right hand page of the book). The customer may simply supply the documents and instructions to the print shop operator, or may utilize a self-service store front computer to enter the document(s) and instructions into the print shop production system. Roztocil does not disclose anywhere that the store front computer 114 provides design capability allowing the customer to customize the design of the product.

Importantly, once the print job is entered into the print shop's production system, the customer *no longer has access to the job*. The product design itself is complete when the customer submits the document(s) and instructions to the print shop. Any further manipulation of the documents by the operator are merely formatting, annotating, and corrective editing to achieve the requirements of the customer's instructions as specified in the job ticket.

The Examiner refers to portions of the Roztocil reference, which discuss the particulars of the workflow management software program and interface executing on the job preparation station 116, as teaching Applicant's recited "one or more user systems for designing a product to be printed...." As explained above, however, only the *print shop operator*, and *not* the print job *customer*, uses the job preparation station 116 and workflow management software executing thereon. It appears that the Examiner is viewing the operator as Applicant's recited "user", and while the Applicant does not agree with this interpretation, the Applicant has nonetheless amended claim 1 to clarify that the user of the user system is "a customer of the remote printing services site". Since the customer of the product does not have access to the workflow management software running on the job preparation workstations 116, the workflow management software

program and interface executing on the job preparation station 116 cannot be equated with Applicant's recited "one or more user systems for allowing *a customer* of a remote printing services site to customize graphical content of a design of a product to be printed."

Furthermore, while the workflow management software allows the print shop *operator* to manipulate the documents of the job, including the very limited editing (e.g., the Touch Up tool) provided by the Adobe Acrobat™ software used to implement the software, the workflow management software cannot be equated with "one or more user systems for allowing a customer of a remote printing services site to customize *graphical content* of a design of a product to be printed". Once the documents and instructions have been submitted to the print shop production system, none of the content of the design is actually changed, or "customized". The documents and instructions represent the complete product design, and any additional manipulation or insertion of page numbers or watermarks, etc., by the print shop operator are per the customer's instructions and are therefore part of the submitted completed design. Thus, the software executing on the job preparation station 116 is not used to customize the "graphical content" of the print job, and for this reason also, the job preparation stations 116 cannot be equated with Applicant's recited "one or more user systems for allowing a customer of a remote printing services site to customize *graphical content* of a design of a product to be printed".

In addition, there is no equivalent of Applicant's recited "one or more **user tools executing in the browser program** on the user processor and configured to allow a customer user of the user system to customize the design of a product at the user system and to communicate over the network with the remote printing services site, and a user display displaying the product design to the customer user of the user system". The workflow management software program and interface executing on the job preparation station 116 executes as a standalone application, and not in a *browser program* as claimed by Applicant. (See Roztocil, col. 13, lines 22 through col. 15, line 29).

Roztocil also does not teach or suggest "one or more remote support systems, each remote support system being operatively connected to the network and having a support processor, a support display, and one or more programs running on the support

processor configured to **allow an operator of the support system to view a user's product design substantially as the product design is being displayed to the user** on the user display". The Examiner refers to Roztocil, col. 14, lines 26-57 as teaching this limitation. The Applicant respectfully disagrees. This passage describes the viewer 306 (implemented using Adobe Acrobat™) executing on the desktop 302 of the job preparation station 116. The Examiner's contends that an operator using the viewer of the workflow management software on the job preparation station 116 can view changes in a document at substantially the same time as a user submitting a job on the store front computer 114 enters them. There is nothing in Roztocil that supports this assertion. To the contrary, the store front computer 114 is provided to allow entry of a job into the print production system and accepts many different types of media and many different electronic file formats, including providing a scanner to scan physical documents. It is only at the job preparation station 116 that the documents are converted into a common file format and viewable in the viewer 306. Thus, there is no teaching or suggestion that the viewer 306 allows "an operator of the support system to view a user's product design substantially as the product design is being displayed to the user on the user display".

The Applicant agrees with the Examiner that Roztocil does not teach the following limitations of Applicant's claim 1: "means for establishing a communication connection between a user of a user system and an operator of a remote support system such that the user of the user system can submit product design inquiries to and receive responses from the operator of the remote support system while the product design is displayed to the user" and "means for establishing a communication connection between the user system and the remote support system such that the support system can obtain the user's product design information from the user system over the network and display the product design to the operator while the operator is communicating with the user over the first communication connection".

The *Matthews* reference is cited as teaching a help facility that allows for real-time communications between a helper and a user. In particular, Matthews discloses methods for facilitating answering request for help or information between requesters of that help or information using digital devices and remote helpers selected to answer those requests. First, Matthews does not make up for the deficiencies of Roztocil in meeting

the limitations of Applicant's claim 1. In particular, Matthews does not teach or suggest "one or more user systems for allowing **a customer of a remote printing services site to customize graphical content of a design of a product to be printed**, each user system being operatively connected to a network and having a user processor running a browser program, **one or more user tools executing in the browser program** on the user processor and configured to allow a customer user of the user system to customize the design of a product at the user system and to communicate over the network with the remote printing services site, and a user display displaying the product design to the customer user of the user system" or "one or more remote support systems, each remote support system being operatively connected to the network and having a support processor, a support display, and one or more programs running on the support processor configured to **allow an operator of the support system to view a user's product design substantially as the product design is being displayed to the user on the user display**".

Second, even if, for the purposes of argument only and not concession, the workflow management software executing on the job preparation station 116 were considered a customizable product design system, it would still not be obvious to combine the help facilitator method and system of Matthews with the print production system of Roztocil because the operator of the job preparation station 116 is the *print shop operator* and *not the customer designing the product to be printed*. The *print shop operator* would be trained to understand how to utilize the print shop software and would not require remote help. Furthermore, since the print shop operator is not changing the graphical content of the print job, the print shop operator does not have any need to "submit product design inquiries to and receive responses from the operator of the remote support system while the product design is displayed to the user".

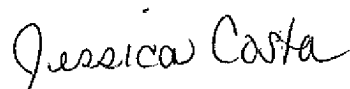
Since none of the foregoing features of claim 1 are taught or suggested by Roztocil even in combination with Matthews, Applicant's claim 1 is believed to be allowable over the cited references.

Independent claims 10, 14, 19, 20 and 21 have also been amended to clarify that the user of the remote printing services site is a customer of the site and not a printing services operator, and are deemed allowable for the same reasons set forth above with

respect to claim 1. Dependent claims 2-9, 11-13, 15-18, and 22-27 likewise deemed to be patentable over the Roztocil and Matthews references.

Favorable action on all claims is respectfully requested.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jessica Costa".

Date: March 12, 2008
VistaPrint USA Inc.
95 Hayden Avenue
Lexington, MA 02421
Phone: 781 652 6563
Fax: 781 652 6092

Jessica Costa, Reg. 41,065